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June 16, 2016

The Honorable Sarah Netburn  
Judge, United States District Court  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007-1312

**Re: In re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 – Request for Extension of June 16, 2017 Document Production Deadline**

Dear Judge Netburn:

This firm represents the Muslim World League (“MWL”) and the International Islamic Relief Organization (“IIRO”) in the above-referenced matter. We write further to the Court’s March 24, 2017 order (Dkt. 3482) setting June 16, 2017 as the deadline for completion of document productions. For the reasons stated herein, MWL and IIRO seek a short extension of the deadline to August 15, 2017. We have contacted counsel for Plaintiffs and all defendants for whom the June 16 deadline is applicable and all have consented to this extension.

While MWL and IIRO have largely completed their production of over 500,000 pages of documents in this litigation, a significant subset of documents recently received by our office from Saudi Arabia that contain potentially responsive documents was improperly scanned in that large portions of the documents are unreadable. To correct this issue, we have been working with our clients and a professional vendor and have taken measures to facilitate a proper rescan of this set of documents. However, because of the Ramadan and the upcoming holidays we have encountered some unavoidable delays and require an extension until August 15, 2017 to correct the scanning issue and complete our review and production of all responsive documents.

We have discussed this matter with Plaintiffs’ counsel at a recent meet and confer and they consent to this request, provided that it applies to all parties for whom the June 16 deadline is applicable. In addition, Plaintiffs’ counsel have requested and we have agreed to provide rolling productions, which will take place by agreement on July 24, August 4 and August 15.

We appreciate the Court’s attention to this matter.

Sincerely,

Aisha E. Bembry

cc: All Counsel of Record